



What This Means for New Major Sources Prior to Increment Project Completion

Air Quality Increment in Missouri
Air Pollution Control Program
Prevention of Significant Deterioration

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Missouri
Department of
Natural Resources

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- **Prior to Increment Project Completion**

- ☆ We can consider there to be two time periods.
- ☆ The current time period is while the PSD Increment Project is active. In other words, before we complete processing of the projects on the consolidated permit listing.
- ☆ The other time period is after the PSD Increment Project is completed, or “normal” operations.
- ☆ Both of these phases can be thought of as simply legal, in that the increment analysis will proceed according to what is actually designated in the federal regulation.



- **Prior to Increment Project Completion
Pre-Application Conferences**

- ☆ During pre-application conferences with potential PSD construction permit applicants, MDNR will reference the consolidated PSD permit listing when determining the appropriate baseline date for each CAA §107 designated area of the state.
- ☆ In consultation with the permit applicant, MDNR will pursue one of the following paths to permit issuance, either:



- ## Prior to Increment Project Completion Proceed According to Current Designation

The applicant performs the full air quality increment analysis using the minor source baseline date previously established by a PSD permit from the consolidated PSD Permit Listing. For those areas of the state where "clean" designations may be less likely, the source will have to weigh the impact of doing a full increment modeling analysis with the likelihood that an area can be made "clean";

- ☆ the applicant will be informed that even though this area may later be shown to have been a "clean" area after the "catch-up" period, no relaxation will be allowed in any emission limitation that is imposed due to an air quality increment issue;
- ☆ the project itself will be considered one of the "catch-up" projects regarding establishing a new baseline area and date;
- ☆ increment tracking at that point in time will proceed just as it will in other catch-up areas, using the newly created baseline date.



- **Prior to Increment Project Completion
Synchronize with Clean Area Designation**

- ☆ The applicant must wait until final federal register action to designate the area which they are locating in as "clean" before MDNR will issue the construction permit. If there is sufficient incentive to redesignate "clean" areas, a source can assist in the inventory development and modeling. For areas that are already relatively clean, this may be a less rigorous approach than full-blown modeling.
- ☆ MDNR may be able to speed up the overall permit process by requesting that EPA process the SIP revision in parallel with the permitting action so that both actions are concluded when MDNR is ready to issue the permit.



Thank You!